

COMMENTS

RESPONSES

O1 – Red Rock Audubon Society  
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SOUTHERN NEVADANS COMMITTED TO CONSERVATION



RED ROCK AUDUBON SOCIETY

Jerry Crockford  
Project Manager for  
Ivanpah Energy Center  
BLM Las Vegas Field Office  
4701 N. Torrey Pine Drive  
Las Vegas, NV 89130-2301

January 17, 2003

RECEIVED  
Bureau of Land Management  
07:30  
JAN 22 2003  
LAS VEGAS  
FIELD OFFICE  
Las Vegas, Nevada

RE: Ivanpah Energy Center

Dear Mr. Crockford,

Thank you for this opportunity to comment on the Draft EIS for the Ivanpah Energy Center.

This project, one of several in the Ivanpah Valley will have significant environmental impacts. Since it is one of at least two, may be three very similar projects in the Ivanpah Valley it is important to minimize the cumulative impacts as well as the individual impacts of this project:

**Location:** It is preferable to put all the energy plants in the same general location. Since there is already one plant at Primm (under construction), this is the appropriate location, rather than the proposed Goodsprings location. This would minimize the miles of new transmission line and roads, as well as avoid the energy cost of pumping water up a 500-foot elevation gradient.

**Wildlife:** The area to the west of I-15 and south of State Route 161 is significant to the desert tortoise recovery efforts. Avoiding the construction and operation of a new transmission line and the plant in that area is preferable.

**Vegetation:** A specific plan for revegetation of disturbed areas needs to be prepared and made available prior to start of construction. This plan needs to detail how yuccas and cacti will be stockpiled during construction, how long stockpiling would occur, and at what density they will be replanted (pre-construction density is preferred). The plan needs to be result rather than action driven. Given the variables of weather and precipitation it may take more than one try at seeding to be successful.

**Penstemon:** The area needs to be surveyed to determine if any of the sensitive *Penstemon* species are present on the site, e.g. *P. bicolor*.

POST OFFICE BOX 96691 LAS VEGAS, NV 89193

O1.1

O1.2

O1.3

O1.4

**O1.1** BLM has selected the Primm Plant Site as the “agency-preferred alternative.” However, following closing of the public comment period, the Primm Plant site alternative became commercially unavailable; therefore, the proposed plant site at Goodsprings and the No Action Alternative remain under consideration. BLM will select an “environmentally-preferred” alternative in the Record of Decision.

**O1.2** BLM will consider your comment.

**O1.3** BLM will develop a Restoration Plan for the Ivanpah Energy Center project, which will include specific details regarding yucca and cacti salvage and re-location. The Restoration Plan will be part of the Construction, Operations, and Maintenance Plan that will be in place prior to construction.

**O1.4** Rare plant surveys were conducted in spring 2002. Results from the field surveys are summarized in the DEIS on page 4-18. Based on the data, “...yellow two-tone beardtongue (*Penstemon bicolor* ssp. *bicolor*), rosy two-tone beardtongue (*P.bicolor* ssp. *roseus*) and white-margined beardtongue (*P. albomarginatus*) potentially are present within the project area.” The text notes that positive identification of these plants was not possible due to the lack of flowering. Mitigation measures, such as spanning concentrations of sensitive plant communities and seed collection, will be addressed in the Restoration Plan as part of Ivanpah Energy



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O1.5



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**Seed Mixtures:** Seed mixtures should only contain seeds which are site specific or at least area specific in origin and only contain seeds of plants normally found in the area of disturbance, and not be in conflict with sensitive species such as *Penstemon*. Use of a generic "Mojave Desert Seed Mix" has caused problems in rehabilitation efforts on other projects in Clark County, NV.

Sincerely,

John E. Hiatt  
Conservation Chair

**O1.5** BLM will use seed mixtures that are site-specific and compatible with the area of disturbance. Appropriate seed mixtures will be addressed in the BLM-approved Restoration Plan specifically developed for the Ivanpah Energy Center project.



**COMMENTS**  
**O2- Kern River Gas Transmission**  
**Company**  
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**RESPONSES**

**From:** Forsberg, Derek J [mailto:Derak.Forsberg@kernrivergas.com]  
**Sent:** Wednesday, January 15, 2003 11:52 AM  
**To:** jcrockfo@nm.blm.gov  
**Cc:** george.high@parsons.com; Donnelly, David W  
**Subject:** Ivanpah Comments to DEIS

Jerry,

Dave Donnelly and I reviewed the Draft EIS for the Ivanpah Energy Center and have the following comments.

Table ES-3 page ES-13 and ES-14:

The assumptions about the natural gas pipeline acreage requirements are incorrect for the Primm alternative.

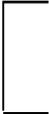
Kern River will need 1 acre of temporary work space for the meter station and 2 acres of temporary work space along the pipeline route for PIs, borings, and work trailers. We do not need a 10-foot wide permanent easement if we can use the existing dirt road to access the meter station. Kern River will temporarily disturb a 75'-width during pipeline construction. The permanent easement would be 50' wide.

If you have questions regarding our comments I can be reached at (801) 584-6353 or you can reach Dave at (801) 584-6347.

Thanks,

Derek Forsberg  
Kern River Gas Transmission Co.

O2.1



**O2.1** Your comment is acknowledged. Acreage requirements for the natural gas pipeline at the Primm Plant Site were adjusted according to your request. The changes are reflected in the revised acreage table for the Primm Plant Site provided in Section 4 of the FEIS.



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O3 – SNWA/LVVWD  
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January 21, 2002

Jerry Crockford, Project Manager  
Bureau of Land Management  
Las Vegas Field Office  
4701 North Torrey Pines Drive  
Las Vegas, NV 89130-2301

Dear Mr. Crockford:

SUBJECT: DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE IVANPAH ENERGY CENTER

O3.1

The Bureau of Land Management (BLM) issued a Draft Environmental Impact Statement (DEIS) for the proposed Ivanpah Energy Center on November 18, 2002. Although the Southern Nevada Water Authority (Authority) and Las Vegas Valley Water District (District) are supportive of projects that will help meet the electrical power needs of southern Nevada, the descriptions in the DEIS regarding the availability of water resources for this project and the potential groundwater resources impacts should be addressed prior to making any final determinations about this project.

O3.2

The DEIS identifies the proposed Ivanpah Energy Center as a refrigerated air-cooled power plant, utilizing gray water from the Southern Nevada Correctional Center (SNCC). The DEIS repeatedly states that a well owned by the District has been proposed by the project proponent as a back-up water supply, should gray water flows from the SNCC become curtailed or interrupted. The Authority and District have been contacted by the project proponent, but have not provided any commitment or guarantee of either water service or use of this well for the project. However, discussions can continue when the information outlined below is available.

O3.3

The potential for groundwater resources to be needed for this project is not clearly described in the DEIS. Information should be available from the SNCC on the volume and regularity of their gray water discharges, including how often these flows might be curtailed or interrupted. The DEIS should indicate whether a long-term water supply contract with the SNCC has been signed for the operational life of the project. This information would then indicate the potential frequency and volume of groundwater that may be needed for the project, and would allow for a more accurate analysis of potential groundwater resources impacts.

**O3.1 – O3.4** The project proponent has proposed the use of gray water from the Southern Nevada Correctional Center (SNCC) as the primary water source for the Ivanpah Energy Center. Water from an existing well that is owned and operated by Las Vegas Valley Water District (LVVWD) was proposed as a secondary water source, should the primary water supply source be curtailed or interrupted.

To date, the BLM has not received confirmation from the project proponent that agreements have been reached with the SNCC, LVVWD, or the State Engineer that either primary source or secondary source waters will be made available for the Ivanpah Energy Center. Should agreements regarding water sources not be available, and become other than those stated in the DEIS, a Supplemental EIS would be required as to fulfill the requirements of NEPA and the BLM would not issue any Notice to Proceed until all water sources, treatment, and conveyance requirements are met.



**COMMENTS**

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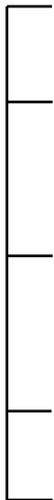
**O3 – SNWA/LVVWD**  
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O3.4

O3.5

O3.6

O3.7



**O3.5** See Errata Sheet for Section 4 and Section 5.

**O3.6** See Errata Sheet for Section 4.

**O3.7** See Errata Sheet for Section 4.



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**COMMENTS**

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PUBLIC HEARING - 12/10/02

T1.1

1 MS. TROUP: My name is Patty T-r-o-u-p. I just  
2 wondered what kind of an impact this is going to have on the  
3 Sandy Valley, Goodsprings Road during construction with the  
4 amount of traffic that actually uses that road going towards  
5 Goodsprings Sandy Valley into Jean and then into town. Is  
6 there going to be disruption on the road itself getting  
7 equipment in and out, that type of thing?

8 MR. CROCKFORD: We won't answer the questions now.  
9 We'll take them as comments. Any others?

T1.2

10 MR. DONNELLY: Dave Donnelly, D-o-n-n-e-l-l-y,  
11 with Kern River Gas Transmission Company. I notice on these  
12 options right here that you're building right on top of our  
13 pipeline. I just want to make sure the BLM reserves this  
14 exclusive right way when you turn it into private land. We  
15 need to protect our pipeline. If you do that, we can  
16 continue to protect it.

T1.3

17 MR. HIATT: John Hiatt, H-i-a-t-t. I disagree  
18 with your proposed or preferred alternative at Goodsprings.  
19 I think a far better site would be at Primm. You've already  
20 got a plant there. The table mountain substation, which is  
21 also at this point somewhat problematic. I would feel much  
22 better if you would select the Primm site as a preferred  
23 alternative.

T1.4

24 MR. MORGAN: My name is Chuck Morgan. I'm  
25 self-employed. I don't see any reference to the new Ivanpah

**T1.1** The DEIS states that during plant construction, there would be an increase in traffic along SR 161 and some decrease in levels of service at major intersections. Mitigation measures to reduce the level of impacts to traffic along these routes include use of a secondary road from SR 161 near Jean for movement of heavy equipment, bussing construction workers to the construction site, and scheduling movement of heavy equipment to avoid periods of peak traffic and recreational weekend traffic.

Concerns regarding traffic safety along SR 161 were expressed during the public scoping meetings. A traffic safety study was conducted along SR 161 and the results were presented in the DEIS. Safety measures such as use of pilot cars both in front and behind equipment loads would reduce concerns regarding sight distance at vertical curves. An additional safety measure would include construction of a turning lane along SR 161 at the plant entrance.

**T1.2** Your comment is acknowledged.

**T1.3** BLM has selected the Primm Plant Site as the "agency-preferred alternative." However, following closing of the public comment period, the Primm Plant site alternative became commercially unavailable; therefore, the proposed plant site at Goodsprings and the No Action Alternative remain under consideration. BLM will select an "environmentally-preferred" alternative in the Record of Decision.

LITIGATION SERVICES & TECHNOLOGIES



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T1.4  
Cont'd

PUBLIC HEARING - 12/10/02

1 Airport. The reason why I say that is the new Ivanpah  
2 Airport, the distance between what used to be called  
3 Lake Mead Boulevard, now St. Rose Delema, the only crossing  
4 between there and Barstow is Nipton Road. That's a distance  
5 of 200 miles with no crossing over the mountains. Nipton  
6 Road, if you've ever traveled it recently, is a mess. The  
7 holes are getting deeper like California's budget. But I  
8 don't see any provisions for traffic. That's 200 miles.  
9 That's a long way.

10 Let's just say our official formal presentation is  
11 closed tonight but keep in mind that the comment period for  
12 this project is open until January 22, 2003. We look  
13 forward to written comments. Encourage your neighbors and  
14 friends to make comments because we need your comments.

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LITIGATION SERVICES & TECHNOLOGIES



